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GUC Trust Administrator*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

**MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al.**

Debtors.

Chapter 11 Case No.

09-50026 (MG)

(Jointly Administered)

CERTIFICATE OF NO OBJECTION

Pursuant to 28 U.S.C. § 1746, Local Bankruptcy Rule 9075-2 and the *Sixth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures* dated May 5, 2011 [ECF No. 10183] (the “**Sixth Amended Case Management Order**”), the undersigned hereby certifies as follows:

1. On July 22, 2020, Wilmington Trust Company, not in its individual capacity and solely in its capacity as trust administrator and trustee of the Motors Liquidation Company GUC Trust (in such capacity, the “**GUC Trust Administrator**”), filed *Wilmington Trust Company’s Motion for Approval of the Participating Unitholders’ Requested Reimbursement of Attorneys’ Fees and Expenses* [ECF No. 14762] (the “**Motion**”).

2. On July 22, 2020, the GUC Trust Administrator (through its agent, Epiq Class Action and Claims Solutions, Inc. (“**Epiq**”)) served notice of the Motion on (a) the

Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Room 1006, New York, New York 10014, (b) the parties in interest in accordance with the Sixth Amended Case Management Order, and (c) the parties required to be served under Section 6.1(b)(iv) of the Motors Liquidation Company GUC Trust Agreement, including, out of an abundance of caution, Designated Bankruptcy Counsel for the Economic Loss Plaintiffs and counsel for certain Additional Ignition Switch Pre-Closing Accident Plaintiffs. *See* ECF Nos. 14765.

3. The deadline for submitting objections to the Motion, as set forth in the Motion, was August 4, 2020 at 4:00 p.m. (Eastern Time) (the “**Objection Deadline**”).

4. The undersigned counsel represents that (i) more than forty-eight (48) hours has passed since the expiration of the Objection Deadline, (ii) it has reviewed the Court’s docket not less than forty-eight (48) hours after the expiration of the Objection Deadline, (iii) no objections, responsive pleadings or requests for hearing appear on the Court’s docket, and (iv) no objections, responsive pleadings or requests for a hearing have been filed or served on the GUC Trust Administrator with respect to the Motion.

6. An electronic copy of the proposed order that was annexed to the Motion will be re-submitted to the Court, along with this Certificate of No Objection pursuant to Local Bankruptcy Rule 9075-2 and the Sixth Amended Case Management Order.

Dated: New York, New York
August 6, 2020

McDERMOTT WILL & EMERY LLP

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